

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATE OF AMERICA,

v.

1. RALPH SANTANIELLO,
  2. GIOVANNI CALABRESE  
a/k/a "Johnny Cal," "John Calabrese,"
  3. GERALD DANIELE,
  4. FRANCESCO DEPERGOLA  
a/k/a "Frank Depergola," "Sammy  
Shark Depergola," and
  5. RICHARD VALENTINI,
- Defendants.

Crim. No. 16CR30033-MGM

Motion for Pretrial Detention

The United States moves for pretrial detention of the defendants, pursuant to 18 U.S.C. § 3142(e) and (f).

1. Eligibility of Case. This case is eligible for a detention order because it involves:

- X Crime of violence (18 U.S.C. § 3156)
  - Maximum sentence of life imprisonment or death
  - 10 plus years drug offense
  - Felony, with two prior convictions in above categories
- X Serious risk defendant will flee
- X Serious risk of obstruction of justice

2. Reason for Detention. The Court should detain the defendants because there are no conditions of release which reasonably will assure (check one or both):

X The defendants' appearance as required

X Safety of any other person and the community

3. Rebuttable Presumption.

At this time, the United States (~~will~~, will not) invoke the rebuttable presumption against defendant pursuant to 18 U.S.C. § 3142(e).

4. Time for Detention Hearing. The United States requests that the Court conduct the detention hearing,

At first appearance

X After continuance of 3 days (not more than 3)

5. Witnesses. At the initial appearance, the United States will rely upon a proffer by an Assistant U.S. Attorney or an Attorney from the Department of Justice, Organized Crime and Gang Section. The United States will file a detention memorandum prior to the detention hearing.

6. Other Matters. None.

Respectfully submitted,

CARMEN M. ORTIZ  
UNITED STATES ATTORNEY

By: /s/ Kevin O'Regan  
Kevin O'Regan (678347)  
Assistant U.S. Attorney  
300 State Street, Suite 230  
Springfield, MA 01105  
413-785-0142  
kevin.o'regan@usdoj.gov

Marianne Shelvey  
Trial Attorney  
DOJ Organized Crime and Gang Section

Certificate of Service

August 4, 2016

I hereby certify that this document will be served by hand on the defendants today in court.

/s/ Kevin O'Regan

Kevin O'Regan

Assistant U.S. Attorney